

SPILLSEPA WSH  
DO NOT ERASE: SEE JAYL  
POLREP #3: DUBLIN WATER SUPPLY  
DUBLIN, BUCKS CO, PA

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (9/15/86, 1500)

A. SURVEY OF RESIDENTS NEARLY COMPLETED. ALL USERS ABOVE ACTION LEVEL OF 80 PPB OF TCE HAVE AN ALTERNATE DRINKING WATER SUPPLY AVAILABLE.

B. CONTACT W/ CDC REVEALS VARIOUS LEVELS AT WHICH ACTION MAY BE TAKEN, PENDING EPA'S RISK MANAGEMENT PHILOSOPHY.

C. OSC AND TAT HAVE MET W/ BUCKS COUNTY HEALTH (BCHD) PROJECT OFFICER, PETE KNOWLES AT BCHD OFFICES 9/12, FRIDAY.

II. ACTIONS TAKEN

A. TAT HAS CONTACTED BY PHONE ALL 9 USERS OF THE 13 WELLS WHICH EXCEED THE 80 PPB ACTION LEVEL FOR TCE. OF THESE ALL ARE AWARE OF THE SITUATION (FROM PRIOR CONTACT W/ BCHD) AND ARE USING ALTERNATE WATER SUPPLY OR ARE TREATING THE CONTAMINATED SUPPLY.

B. TAT HAS CONTACTED BY PHONE, 8 USERS OF THE 10 WELLS WHICH CONTAIN GREATER THAN 5PPB BUT LESS THAN 80 PPB TCE. ALL USERS ARE AWARE OF THE SITUATION AND ARE USING ALTERNATE WATER SUPPLY OR ARE TREATING THE CONTAMINATED SUPPLY.

C. TAT WILL CONTINUE ATTEMPTS TO CONTACT THE 2 USERS YET TO BE CONTACTED.

D. OSC CONTACTED PETE KNOWLES OF BCHD WHO HAS MET W/ OSC AND TAT AT BCHD OFFICE IN DOYLESTOWN 1000 HRS, 9/12 TO REVIEW THE CASE FILE AND VISIT THE SITE.

E. BCHD PROVIDED THE RESULTS OF LATEST SAMPLING OF WELLS AROUND THE SUSPECTED SOURCE, THE THOMSON PLANT (9/12). RESULTS UPGRADIENT OF THE THOMSON PLANT ARE "CLEAN".

F. OSC HAS CONTACTED CDC (BOB WILLIAMS AND BILL CIBULAS). OSC SOUGHT GUIDANCE REGARDING TCE ACTION LEVEL FOR REMOVALS. SPECIFICALLY;  
- AT WHAT LEVEL SHOULD ALTERNATE WATER BE PROVIDED, AND  
- WHAT IS THE EFFECT OF BOILING TCE CONTAMINATED WATER FOR DRINKING (RECOMMENDED BY BCHD IN LETTER TO RESIDENTS AND IMPLEMENTED BY 2 RESIDENTS WITH GREATER THAN AND 1 RESIDENT LESS THAN 80 PPB TCE).

G. CDC PROVIDED THE OSC WITH THE FOLLOWING INFORMATION:  
-TWO EFFECTS OF TCE MUST BE CONSIDERED: TOXICITY AND CARCINOGENICITY.

-THE DRINKING WATER EQUIVALENT LEVEL (DWEL), A TOXICITY VALUE FOR TCE IS PRESENTLY 260 PPB. IT WAS RECOMMENDED THAT FROM A TOXICITY STANDPOINT 50% OF THE DWEL (130 PPB TCE) BE USED AS A CUT OFF FOR

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RECOMMENDING ACTION. VALUES OF 80-130 PPB HAVE BEEN RECOMMENDED AS ACTION LEVELS ON OTHER RECENT JOBS. THIS IS REASONABLY STRAIGHT FORWARD.

-THE CARCINOGENICITY DATA IS NOT AS CLEAR  
5 PPB IS THE RECOMMENDED MAXIMUM CONTAMINANT LEVEL (RMCL) FOR TCE.

2.7 PPB IS THE NUMBER AT WHICH A USER'S RISK, OF GETTING CANCER, OVER A 70 YEAR LIFETIME, CONSUMING 2 LITERS OF WATER PER DAY, INCREASES BY 1 IN A MILLION (10 E-06).

THERE IS DISAGREEMENT IN THE SCIENTIFIC COMMUNITY ABOUT THE APPLICATION OF THESE VALUES TO REMOVAL ACTIONS. ALSO, THE ACCEPTABLE LEVEL OF RISK AT WHICH REMOVAL ACTION IS APPROPRIATE IS NOT CLEAR. CDC HAS RECOMMENDED TO THE OSC THAT THE EPA NEEDS TO MAKE A RISK MANAGEMENT DECISION IN REGARD TO THE LEVEL OF RISK TO THE PUBLIC AT WHICH REMOVAL ACTION WILL BE TRIGGERED.

H. A COMPLICATING FACTOR IS THAT WHILE CARCINOGENICITY IS AN EFFECT OF LONG TERM EXPOSURE, THE PERIOD OF EXPOSURE AND CONCENTRATIONS ARE SELDOM KNOWN. PRESENT PRACTICE BY OSC'S IS TO ASSUME, UNLESS INFORMATION TO THE CONTRARY EXISTS, EXPOSURES OF LONG TERM DURATION HAVE OCCURRED.

I. IT IS THE OSC'S JOB TO FURRET OUT SITE SPECIFIC DETAILS WHICH ARE REQUIRED TO SELECT REMOVAL ALTERNATIVES. HOWEVER, GUIDANCE IS REQUIRED FROM THE AGENCY REGARDING THE ACCEPTABLE LEVEL OF RISK THAT THE AGENCY IS WILLING TO HAVE THE PUBLIC ASSUME PRIOR TO SUPPLYING ALTERNATIVE WATER SUPPLY IN THIS AND SIMILAR CASES.

J. OSC AND OSC WRIGHT HAVE CONTACTED ERD REGARDING THE GUIDANCE REQUESTED IN ACTIONS TAKEN I. (9/12). ERD INDICATES ONLY REMOVAL GUIDANCE FOR GROUNDWATER ACTIONS IS A MEMO FROM BILL HEDEMAN, 1983 VINTAGE, DISCUSSING USE OF 10 DAY HEALTH ADVISORY CRITERIA FOR REMOVALS. THE APPLICABILITY OF OTHER CRITERIA HAS NOT BEEN DOCUMENTED.

K. IN LIGHT OF THE EXPANDED SCOPE OF REMOVALS IN THE NEW NCP, THE INFLUX OF GROUNDWATER CONTAMINATION SITES, AND THE UNCERTAINTY IN THE SCIENTIFIC COMMUNITY, GUIDANCE IS NECESSARY AS SOON AS POSSIBLE SO THAT WE (OSC'S) CAN BE CONSISTENT IN OUR APPROACH TO THESE SITES.

### III. FUTURE PLANS

A. TAT TO PROVIDE OSC W/ DATA PACKAGE (9/16).

B. OSC TO PROVIDE DATA PACKAGE TO CDC FOR REVIEW AND FORMAL RECOMMENDATIONS.

C. OSC TO CONTACT PADER FOR THEIR ENFORCEMENT POSITION AND COORDINATE W/ CERCLA ENFORCEMENT PENDING PADER'S POSITION.

D. OSC TO CONTINUE COORDINATION W/BCHD.

E. OSC WILL CONTINUE TO SEEK CLARIFICATION REGARDING THE ACCEPTABLE CARCINOGENIC RISK TO THE PUBLIC. THIS WILL DIRECTLY RELATE TO THE EXTENT OF REMOVAL ACTION.

JAY RODSTEIN, OSC  
EPA REGION III  
PHILA, PA

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